

1 DYLAN P. TODD, ESQ.
Nevada Bar No. 10456
2 TODD W. BAXTER, ESQ.
Admitted Pro Hac Vice
3 McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP
4 8337 West Sunset Road, Suite 350
Las Vegas, NV 89113
5 Telephone: (702) 949-1100
Facsimile: (702) 949-1101
6 *dylan.todd@mccormickbarstow.com*
renee.maxfield@mccormickbarstow.com
7 *todd.baxter@mccormickbarstow.com*
8 ERON Z. CANNON
Nevada Bar No. 8013
9 FAIN ANDERSON VANDERHOEF
ROSENDAHL O'HALLORAN SPILLANE PLLC
10 701 5th Avenue #4750
Seattle, Washington 98104
11 Telephone: (206) 749-0094
Facsimile: (206) 749-0194
12 *eron@favros.com*

13 Attorneys for Plaintiffs/Counterdefendants

14 UNITED STATES DISTRICT COURT

15 DISTRICT OF NEVADA

16 ALLSTATE INSURANCE COMPANY,
ALLSTATE PROPERTY & CASUALTY
17 INSURANCE COMPANY, ALLSTATE
INDEMNITY COMPANY, and ALLSTATE
18 FIRE & CASUALTY INSURANCE
COMPANY,

19 Plaintiffs,

20 v.

21 MARJORIE BELSKY, MD; MARIO
22 TARQUINO, MD; MARJORIE BELSKY,
MD, INC., doing business as INTEGRATED
23 PAIN SPECIALISTS; and MARIO
TARQUINO, MD, INC., DOES 1-100, and
24 ROES 101-200,

25 Defendants.

26 AND RELATED CLAIMS

CASE NO. 2:15-cv-2265-MMD-CWH

STIPULATION TO INCLUDE MAINOR
WIRTH. LLP INTO THE STIPULATED
CONFIDENTIALITY AND PROTECTIVE
ORDER (ECF NO. 49) FOR THE
DISCLOSURE OF DOCUMENTS
PURSUANT TO F.R.C.P. 45 SUBPOENA

27
28 2:15-cv-2265-MMD-CWH

1 Plaintiffs/Counter-defendants ALLSTATE INSURANCE COMPANY, ALLSTATE
2 PROPERTY & CASUALTY INSURANCE COMPANY, ALLSTATE INDEMNITY COMPANY,
3 and ALLSTATE FIRE & CASUALTY COMPANY (collectively referred to as the "Plaintiffs"), and
4 the law firm of MAINOR WIRTH, LLP (non-party herein after referred to as "MAINOR") hereby
5 stipulate and agree as follows:

6 1. Plaintiffs served MAINOR with a subpoena pursuant to F.R.C.P. 45 for the production
7 of documents regarding communications and payments made by and between Law Firm and the
8 Defendants during MAINOR's representation of certain clients in personal injury claims for which
9 Plaintiffs paid on settlement on behalf of Plaintiffs' insureds.

10 2. MAINOR is aware that Plaintiffs have subpoenaed several law firms seeking the same
11 type of information pursuant to Rule 45 in this case, as well as a companion sister-lawsuit *Allstate v.*
12 *Shah, et. al. Case No. 2:15-cv-01786-APG-CWH* ("*Shah*").

13 4. MAINOR understands that this Court presides over both the instant matter as well as
14 the *Shah* matter, and that this Court has ruled consistently in both these cases and ordered other law
15 firms to produce the same type of documents request of MAINOR.

16 5. A stipulated confidentiality and protective order in this case entered between Plaintiffs
17 and Defendants for the disclosure of confidential, sensitive or other protected information was
18 approved by this Court on June 3, 2016. (ECF No. 49).

19 6. MAINOR was not a party to the stipulated confidentiality and protective order. (ECF
20 No. 49).

21 7. In ordering compliance with Plaintiffs' subpoenas to other law firms, this Court also
22 ordered that the confidentiality and protective order (ECF No. 49) be applied to those law firms.

23 8. In accordance with this Court's prior rulings both in this action and in the *Shah* matter,
24 the parties hereby stipulate and agree that the protections and scope articulated in the Stipulated
25 Confidentiality and Protective Order approved by this Court on June 3, 2016. (ECF No. 49) be
26 extended in their entirety to cover MAINOR in its compliance with Plaintiffs' subpoena.

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1 9. MAINOR will produce all documents responsive to the subpoena within ten (10) days
2 of approval and entry of this Order by the Court.

3 IT IS SO STIPULATED.

4 Dated:

Dated:

5 McCORMICK, BARSTOW, SHEPPARD,
6 WAYTE & CARRUTH LLP

MAINOR WIRTH, LLP

7 By: 

By: 

8 DYLAN P. TODD, ESQ.

6018 S. Fort Apache Rd., #150

Nevada Bar No. 10456

Las Vegas, NV 89148

9 8337 West Sunset Road, Suite 350

702-464-5000

Las Vegas, NV 89113

10 *Attorneys for Plaintiffs/Counterdefendants*

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15 ORDER

16 IT IS SO ORDERED.

17 DATED this 30 day of January, 2019.

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20 UNITED STATES MAGISTRATE JUDGE

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